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Attorneys for Defendants
CITY OF FAIRFIELD AND ZACHARY SANDOVAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALVIN RUSH and JAYME RUSH,
Plaintiff,

v.

CITY OF FAIRFIELD, OFFICERS
ZACHARY SANDOVAL AND DUSTIN
JOSEPH,
Defendants.

Case No. 2:21-cv-01120-WBS-KJN

**STIPULATION AND
ORDER TO EXTEND DISCOVERY
DEADLINES**

Hon. William B. Shubb

IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiffs and Defendants by and through their designated counsel, that:

WHEREAS, on June 21, 2021, Plaintiff filed his Complaint. (Doc. 1).

WHEREAS, on February 2, 2022, Defendants City of Fairfield and Zachary Sandoval filed their Answer. (Doc. 10).

WHEREAS, on March 16, 2022, the Court issued the case schedule (Doc. 12);

WHEREAS, Defendants City of Fairfield and Zachary Sandoval retained new counsel in January 2023.

WHEREAS, the court ordered previously extended the discovery deadlines to June 5, 2023 (Doc. 22).

WHEREAS, the parties scheduled the depositions of Calvin Rush (plaintiff), Shakaar Boyd (witness), Dustin Joseph (defendant), and Zachary Sandoval (defendant) within the discovery period.

WHEREAS, the parties had to cancel and reschedule the deposition of Plaintiff Jayme Rush due to the parties' schedules. Plaintiff Jayme Rush is scheduled to be deposed on June 19, 2023.

WHEREAS, due to the parties' schedules, the deposition of Roger Clark (plaintiff's police practices expert) is scheduled for July 6, 2023.

WHEREAS, the parties have requested one extension of deadlines thus far.

WHEREAS, the parties JOINTLY request and STIPULATE TO the Court extending the discovery cutoff to July 20, 2023, to complete Jayme Rush's deposition..

WHEREAS, the parties JOINTLY request and STIPULATE TO the Court extending the discovery cutoff to July 6, 2023, to complete the depositions of plaintiff Jayme Rush and Roger Clark.

IT IS SO AGREED.

Respectfully submitted,

Dated: May 19, 2023

CASTILLO, MORIARTY,
TRAN & ROBINSON, LLP

By: /s/ John Robinson
PATRICK MORIARTY
JOHN ROBINSON
JOANNE TRAN
Attorneys for Defendants
CITY OF FAIRFIELD and ZACHARY
SANDOVAL

Dated: May 19, 2023

BERTRAND FOX ELLIOT OSMAN & WENZEL

By: /s/Richard Osman
RICHARD W. OSMAN
Attorneys for Defendants
DUSTIN JOSEPH

LAW OFFICE OF STANLEY GOFF

Dated: May 19, 2023

By: /s/ Stanley Goff

STANLEY GOFF

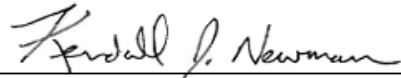
Attorney for Plaintiffs

CALVIN RUSH and JAYME RUSH

ORDER

The parties have agreed to an extension of discovery to July 6, 2023. For good cause, this request is granted. The court notes the parties have not requested an extension of the dispositive motion deadline, which is June 20, 2023. Should they require an extension on this deadline also, the parties shall direct this request to the assigned district judge.

Dated: May 23, 2023



KENDALL J. NEWMAN

UNITED STATES MAGISTRATE JUDGE

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